

October 22, 2001

Vince Monza
Fleetwood Motor Homes of Indiana, #44
P.O.Box 31
Decatur, IN 46733

Re: 001-12860
First Significant Permit Modification to
Part 70 No.: T 001-7465-00025

Dear Vince Monza:

Fleetwood Motor Homes of Indiana, #44 was issued a Part 70 Permit on December 17, 1998 for motor home manufacturing plant. A letter requesting changes to this permit was received on March 23, 2000. Pursuant to the provisions of 326 IAC 2-7-12 a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of revising the VOC usage limitation set in the Best Available Control Technology determination for this source under the Significant Source Modification 007-12077.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Gurinder Saini, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call at (800) 451-6027, press 0 and ask for Gurinder Saini or extension 3-0203, or dial (317) 233-0203.

Sincerely,
Original signed by

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments

GS

cc: File - Adams County
U.S. EPA, Region V
Adams County Health Department
Air Compliance Section Inspector - Jim Thorpe
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT OFFICE OF AIR MANAGEMENT

**Fleetwood Motor Homes of Indiana, #44
1031 U.S. 224 East
Decatur, Indiana 46733**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T001-7465-00025	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: December 17, 1998 Expiration Date: December 17, 2003
First Significant Permit Modification 001-12860	Pages Affected: 28-30
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date: October 19, 2001

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (1) One (1) motor home painting operation, with spray/curing booths identified as 2A, 2B, 2C, 2D, 3B, 6A, 6B, 7A and 7B, with an average capacity of 3 motor homes per hour, using dry filters to control particulate matter, and exhausting to stacks 2A, 2B, 2C, 2D, 3B, 6A, 6B, 7A and 7B respectively.
- (2) One (1) adhesive application operation, identified as spray booth 4A, utilizing air atomization, with an average capacity of 200 lbs per hour per hour, using dry filters as control, and exhausting to stack 4A.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOC) BACT Limits [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6, the graphics stripping and logo painting operation, the adhesive application and finish coating operation and the front cap, rear cap and skirt painting operation shall reduce VOC emissions using Best Available Control Technology (BACT). The BACT conditions for this facility shall be as follows:

- (1) The VOC usage per motor home shall be limited to dependent upon size of motor home being produced as following:

Motor home type	Motor home length (feet)	pounds of VOC per motor home (Monthly average)
Small	30	73
Large	45	111.5

- (2) use of air atomization spray application
- (3) Utilization of low VOC coatings
- (4) Implementation of pollution prevention techniques, including but not limited to storing solvent and solvent soaked rags in closed containers.

D.1.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

Pursuant to CP 01-11-93-0137, issued on December 1, 1989, this facility shall use less than 250 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per 12 consecutive month period. This usage limit is required to limit the potential to emit of VOC to less than 250 tons per 12 consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

D.1.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2, the PM from the three (3) spray booth operations (graphics stripping and logo painting, cabinet shop adhesive and finish coating and front cap, rear cap and skirt painting) shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.5 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.6 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions C.1, D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.7 VOC Emissions

Compliance with Condition C.1, D.1.1 and D.1.2 shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent month in reference to Condition D.1.1 and the most recent 12 months in reference to Condition C.1

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.8 Particulate Matter (PM)

Pursuant to CP 01-11-93-0137, issued on December 1, 1989, the dry filters for PM control shall be in operation at all times when the three (3) spray booth operations (graphics striping and logo painting, cabinet shop adhesive and finish coating and front cap, rear cap and skirt painting) are in operation.

D.1.9 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, daily observations shall be made of the overspray from the surface coating booth stack while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Weekly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a

violation of this permit.

- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.10 Record Keeping Requirements

- (a) To document compliance with Conditions C.1, D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions C.1, D.1.1 and D.1.2.
 - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC usage for each month; and
 - (5) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.1.6, D.1.7 and D.1.9, the Permittee shall maintain a log of daily overspray observations, daily and weekly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.11 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions C.1, D.1.1 and D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

October 22, 2001

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document for a Part 70 Operating Permit Significant Permit Modification

Source Name:	Fleetwood Motor Homes of Indiana, #44
Source Location:	1031 U.S. 224 East, Decatur, IN 46733
County:	Adams
SIC Code:	3716
Operation Permit No.:	T001-7465-00025
Operation Permit Issuance Date:	December 17, 1998
Significant Permit Modification No.:	001-12860-00025
Permit Reviewer:	Gurinder Saini

On June 9, 2001, the Office of Air Quality (OAQ) had a notice published in the Decatur Daily, Decatur, Indiana, stating that Fleetwood Motor Homes of Indiana #44 had applied for a Significant Source Modification under Part 70 Operating Permit to modify the Best Available Control Technology condition. The notice also stated that OAQ proposed to issue a modification for this motor home manufacturing operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments.

Upon further review, the OAQ has decided to make the following revisions to the permit condition (bolded language has been added, the language with a line through it has been deleted):

1. Condition D.1.1 of the permit is revised to correctly reflect the averaging period for VOC emission limit as follows:

D.1.1 Volatile Organic Compounds (VOC) BACT Limits [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6, the graphics stripping and logo painting operation, the adhesive application and finish coating operation and the front cap, rear cap and skirt painting operation shall reduce VOC emissions using Best Available Control Technology (BACT). The BACT conditions for this facility shall be as follows:

- (1) The VOC usage per motor home shall be limited to dependent upon size of motor home being produced as following:

Motor home type	Motor home length (feet)	pounds of VOC per motor home (daily Monthly average)
Small	30	73
Large	45	111.5

- (2) Implementation of high transfer efficiency spray technologies (use of air atomization spray application).
- (3) Utilization of low VOC coatings
- (4) Implementation of pollution prevention techniques, including but not limited to storing

- solvent and solvent soaked rags in closed containers.
2. Condition D.1.10 of the permit is revised to correct references to the conditions in the compliance determination and monitoring requirements, as follows:

D.1.10 Record Keeping Requirements

- (a) To document compliance with Conditions C.1, D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions C.1, D.1.1 and D.1.2.
- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
- (2) A log of the dates of use;
- (3) The cleanup solvent usage for each month;
- (4) The total VOC usage for each month; and
- (5) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.1.6, **D.1.7** and **D.1.79**, the Permittee shall maintain a log of daily overspray observations, daily and weekly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Significant Permit Modification to a Part 70 Operating Permit

Source Background and Description

Source Name:	Fleetwood Motor Homes of Indiana, #44
Source Location:	1031 U.S. 224 East, Decatur, IN 46733
County:	Adams
SIC Code:	3716
Operation Permit No.:	T001-7465-00025
Operation Permit Issuance Date:	December 17, 1998
First Significant Permit Modification No.:	001-12860-00025
Permit Reviewer:	Gurinder Saini

The Office of Air Quality (OAQ) has reviewed a source modification application from Fleetwood Motor Homes of Indiana, #44 relating to the to the VOC application limit per motor home and a new BACT. This request is being reviewed as part of Significant Source Modification 001-12077-00025. The changes as a result of this source modification request will be incorporated in the Part 70 Permit 001-7465-00025 through this Significant Permit Modification.

Explanation of Modification

The section D.1 containing facility operation conditions of the Part 70 Permit is modified as follows (the language deleted is shown in strikethrough and added is shown in bold):

SECTION D.1 ~~FACILITY OPERATION CONDITIONS~~

~~Facility Description [326 IAC 2-7-5(15)]~~

- ~~(1) One (1) motor home painting operation, with spray/curing booths identified as 2A, 2B, 2C, 2D, 3B, 6A, 6B, 7A and 7B, with an average capacity of 3 motor homes per hour, using dry filters to control particulate matter, and exhausting to stacks 2A, 2B, 2C, 2D, 3B, 6A, 6B, 7A and 7B respectively.~~
- ~~(2) One (1) adhesive application operation, identified as spray booth 4A, utilizing air atomization, with an average capacity of 200 lbs per hour per hour, using dry filters as control, and exhausting to stack 4A.~~

Emission Limitations and Standards [326 IAC 2-7-5(1)]

~~D.1.1 Volatile Organic Compounds (VOC) BACT Limits [326 IAC 8-1-6]~~

~~Pursuant to CP 01-11-93-0137, issued on December 1, 1989, and 326 IAC 8-1-6, the graphics striping and logo painting operation, the adhesive application and finish coating operation and the front cap, rear cap and skirt painting operation are subject to BACT. The BACT conditions are:~~

- ~~_____ (1) VOC emissions are limited to a daily average of 73 pounds per motor home; and~~
- ~~_____ (2) use of air atomization spray application.~~

~~D.1.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]~~

~~Pursuant to 326 IAC 6-3-2, the PM from the three (3) spray booth operations (graphics striping and logo painting, cabinet shop adhesive and finish coating and front cap, rear cap and skirt painting) shall not exceed the pound per hour emission rate established as E in the following formula:_____~~

~~Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:~~

~~_____ $E = 55.0 P^{0.44} - 40$ _____ where E = rate of emission in pounds per hour; and~~
~~_____ P = process weight rate in tons per hour~~

~~D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]~~

~~A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.~~

Compliance Determination Requirements

~~D.1.4 Testing Requirements [326 IAC 2-7-6(1),(6)]~~

~~The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limit specified in Condition D1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.~~

~~D.1.5 Volatile Organic Compounds (VOC)~~

~~Compliance with the VOC content and usage limitations contained in Conditions C.1 and D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.~~

~~D.1.6 VOC Emissions~~

~~Compliance with Condition C.1 and D.1.1 shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent month in reference to Condition D.1.1 and the most recent 12 months in reference to Condition C.1~~

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

~~D.1.7 Particulate Matter (PM)~~

~~Pursuant to CP 01-11-93-0137, issued on December 1, 1989, the dry filters for PM control shall be in operation at all times when the three (3) spray booth operations (graphics striping and logo painting, cabinet shop adhesive and finish coating and front cap, rear cap and skirt painting) are in operation.~~

~~D.1.8 Monitoring~~

- ~~(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, daily observations shall be made of the overspray from the surface coating booth stack while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be~~

~~considered a violation of this permit.~~

- (b) ~~Weekly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.~~
- (c) ~~Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.~~

~~Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]~~

~~D.1.9 Record Keeping Requirements~~

- (a) ~~To document compliance with Conditions C.1 and D.1.1, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions C.1 and D.1.1.~~
- (1) ~~The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;~~
- (2) ~~A log of the dates of use;~~
- (3) ~~The cleanup solvent usage for each month;~~
- (4) ~~The total VOC usage for each month; and~~
- (5) ~~The weight of VOCs emitted for each compliance period.~~
- (b) ~~To document compliance with Condition D.1.6 and D.1.7, the Permittee shall maintain a log of daily overspray observations, daily and weekly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.~~
- (c) ~~All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.~~

~~D.1.10 Reporting Requirements~~

~~A quarterly summary of the information to document compliance with Conditions C.1 and D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.~~

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (1) One (1) motor home painting operation, with spray/curing booths identified as 2A, 2B, 2C, 2D, 3B, 6A, 6B, 7A and 7B, with an average capacity of 3 motor homes per hour, using dry filters to control particulate matter, and exhausting to stacks 2A, 2B, 2C, 2D, 3B, 6A, 6B, 7A and 7B respectively.
- (2) One (1) adhesive application operation, identified as spray booth 4A, utilizing air atomization, with an average capacity of 200 lbs per hour per hour, using dry filters as control, and exhausting to stack 4A.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOC) BACT Limits [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6, the graphics stripping and logo painting operation, the adhesive application and finish coating operation and the front cap, rear cap and skirt painting operation shall reduce VOC emissions using Best Available Control Technology (BACT). The BACT conditions for this facility shall be as follows:

1. The VOC usage per motor home shall be limited to dependent upon size of motor home being produced as following:

Motor home type	Motor home length (feet)	pounds of VOC per motor home (daily average)
Small	30	73
Large	45	111.5

2. Use of air atomization spray application
3. Utilization of low VOC coatings
4. Implementation of pollution prevention techniques, including but not limited to storing solvent and solvent soaked rags in closed containers.

D.1.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

Pursuant to CP 01-11-93-0137, issued on December 1, 1989, this facility shall use less than 250 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per 12 consecutive month period. This usage limit is required to limit the potential to emit of VOC to less than 250 tons per 12 consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

D.1.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2, the PM from the three (3) spray booth operations (graphics stripping and logo painting, cabinet shop adhesive and finish coating and front cap, rear cap and skirt painting) shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.5 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.6 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions C.1, D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.7 VOC Emissions

Compliance with Condition C.1, D.1.1 and D.1.2 shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent month in reference to Condition D.1.1 and the most recent 12 months in reference to Condition C.1

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.8 Particulate Matter (PM)

Pursuant to CP 01-11-93-0137, issued on December 1, 1989, the dry filters for PM control shall be in operation at all times when the three (3) spray booth operations (graphics striping and logo painting, cabinet shop adhesive and finish coating and front cap, rear cap and skirt painting) are in operation.

D.1.9 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, daily observations shall be made of the overspray from the surface coating booth stack while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Weekly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when

a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.10 Record Keeping Requirements

- (a) To document compliance with Conditions C.1, D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions C.1, D.1.1 and D.1.2.
 - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC usage for each month; and
 - (5) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.1.6 and D.1.7, the Permittee shall maintain a log of daily overspray observations, daily and weekly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.11 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions C.1, D.1.1 and D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

Justification for the Modification

The Part 70 Operating permit is being modified through a Part 70 Significant Permit Modification. This modification is being performed pursuant to 326 IAC 2-7-12 for incorporating a Significant Source Modification in the Part 70 Permit.

Recommendation

The staff recommends to the Commissioner that the Significant Permit Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on March 23, 2000. Additional information was received on May 02, 2001.

Conclusion

This permit modification shall be subject to the conditions of the attached *Part 70* Significant Permit Modification No. 001-12860-00025.